

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ARLANDO HENDERSON,

Defendant.

DOCKET NO.:3:19-cr-00345-FDW-DCK

**UNOPPOSED MOTION FOR
MODIFICATION OF CONDITIONS
OF PRETRIAL RELEASE**

Mr. Arlando Henderson, by and through undersigned counsel of record, Assistant Federal Defender Taylor Goodnight, respectfully submits the following Motion for Modification of Conditions of Pretrial Release to allow for travel in the Middle District of North Carolina, as well as travel outside of the Middle and Western Districts of North Carolina with the permission of the Office of Probation and Pretrial Services. As grounds therefore, it is averred:

1. Mr. Henderson was arrested on December 4, 2019, in the Southern District of California on charges arising from this district, the Western District of North Carolina.

2. On December 6, 2019, the Honorable William V. Gallo, a United States Magistrate Judge from the Southern District of California, set conditions of release for Mr. Henderson.

3. The conditions of release forbid travel to Mexico and restricted travel in the United States to San Diego and Imperial Counties in California and to the Western District of North Carolina.

4. On January 7, 2010, Mr. Henderson appeared before the Honorable David C. Cayer in this district, and the Court allowed Mr. Henderson to remain released on the same conditions set in the Southern District of California.

5. Mr. Henderson currently resides in Concord, North Carolina, which is in the Middle District of North Carolina, and he is being supervised by that district.

6. Additionally, the current conditions of release do not allow for any travel outside of the listed districts, even with permission of his probation officer.

7. Therefore, Mr. Henderson requests that the Court modify his conditions of release to also allow for travel in the Middle District of North Carolina, and to allow for travel outside of the Western and Middle Districts of North Carolina “as approved by the Office of Probation and Pretrial Services.”

8. Undersigned counsel spoke with Assistant United States Attorney Daniel Ryan, who is assigned to the case, and United States Probation Officer Matthew Wzorek, who supervises Mr. Henderson, and neither party objects to this Motion for Modification of Conditions on Pretrial Release.

Respectfully submitted:

s/ Taylor Goodnight
Taylor Goodnight
N.C. Bar No. 50735
Attorney for Arlando Henderson
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DATE: February 5, 2020

CERTIFICATE OF SERVICE

I, Taylor Goodnight, Assistant Federal Defender, hereby certify that on February 5, 2020, I served a copy of the attached **UNOPPOSED MOTION FOR MODIFICATION OF CONDITIONS OF PRETRIAL RELEASE** via electronic filing upon:

Daniel Ryan
U.S. Attorney's Office
Suite 1650, Carillon Building
227 West Trade Street
Charlotte, NC 28202
(704) 344-6222
(704) 344-6629 Fax

s/ Taylor Goodnight
Taylor Goodnight
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